

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
Kaitlin Hudson,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 11-CV-00278-JD
)	
Dr. Michael J. O'Connell's Pain Care)	
Center, Inc. and Dr. Michael J. O'Connell,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION FOR INDEPENDENT
MEDICAL EXAMINATION**

NOW COME the Defendants, Dr. Michael J. O'Connell's Pain Care Center, Inc. and Dr. Michael J. O'Connell, by and through counsel, Shaheen & Gordon, PA, objecting to Plaintiff's Motion for Independent Medical Examination, and, in support thereof, state as follows:

1. Plaintiff Kaitlin Hudson has filed a Motion for Independent Medical Examination.
2. For the reasons stated in the attached Memorandum of Law, the Motion for Independent Medical Examination should be denied.

WHEREFORE the Defendants respectfully request that this Honorable Court:

- a. Deny the Motion for Independent Medical Examination; and
- b. Grant such further relief as the Court deems necessary and just.

Respectfully submitted,

Dr. Michael J. O'Connell's Pain Care Center,
Inc. and Dr. Michael J. O'Connell
By Their Attorneys:
SHAHEEN & GORDON, P.A.

Dated: December 23, 2011

/s/ William E. Christie
William E. Christie
NH Bar #11255
107 Storrs Street
P.O. Box 2703
Concord, NH 03302-2703
(603) 225-7262
wchristie@shaheengordon.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 23, 2011.

DATED: December 23, 2011

/s/ William E. Christie
William E. Christie
Bar No. 11255
Shaheen & Gordon, P.A.
107 Storrs Street, P.O. Box 2703
Concord, NH 03302
(603) 225-7262
wchristie@shaheengordon.com